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*Attorneys for Irving H. Picard, Trustee
for the Substantively Consolidated SIPA Liquidation
of Bernard L. Madoff Investment Securities LLC
and the Chapter 7 Estate of Bernard L. Madoff*

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

No. 08-01789 (SMB)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the Liquidation of
Bernard L. Madoff Investment Securities LLC,

Plaintiff,

v.

HSBC BANK PLC, et al.,

Defendants.

Adv. Pro. No. 09-01364 (SMB)

**DECLARATION OF OREN J. WARSHAVSKY IN FURTHER
SUPPORT OF THE TRUSTEE'S MOTION FOR THE ISSUANCE OF
LETTER OF REQUEST FOR SAVERIO FIORINO**

I, Oren J. Warshavsky, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner at Baker & Hostetler LLP, counsel for Plaintiff Irving H. Picard, as trustee (the “Trustee”) for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa, *et seq.*, and the chapter 7 estate of Bernard L. Madoff.

2. I submit this declaration in further support of the Trustee’s Motion for the Issuance of Letter of Request for Saverio Fiorino.

3. Attached hereto as **Exhibit 1** is a true and correct copy of relevant excerpts of the Disclosures of Alpha Prime Fund Ltd and Alpha Prime Fund Asset Management Ltd Pursuant to Federal Rule of Bankruptcy Procedure 7026 and Federal Rule of Civil Procedure 26(a)(1)(A), dated November 9, 2015.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on the 25th day of February, 2020, at New York, New York.

/s/ Oren J. Warshavsky

Oren J. Warshavsky